

**PELUSO & TOUGER, LLP**

ATTORNEYS AT LAW  
70 LAFAYETTE STREET  
NEW YORK, NEW YORK 10013

BY ECF:

May 12, 2021

Honorable Kimba Wood  
United States District Court Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

TELEPHONE: (212) 608-1234 FAX/SIMILE: (212) 513-1989
USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>5/18/21</u>

Re: United States v. Anthony Melo, 19 Cr 821 (KMW)

MEMO ENDORSED

Your Honor,

I am writing on behalf of the defendant, Anthony Melo who as the Court is aware, is released on a \$100,000.00 Bond, co-signed by three members of his family and is on home detention with electronic monitoring. Since his release from custody Mr. Melo has fulfilled all of pre-trial release requirements. Mr. Melo would most respectfully request permission to leave his home and go to his grandmother's house located at 609 West 196 Street. #3F, New York, New York 10040 on Saturday, May 15th from 3:00PM to 9:00PM. The family is holding a very small family gathering to celebrate his niece's birthday. It is being held at his grandmother's house because she is afraid to venture outside due to the pandemic. The only people in attendance at the gathering will be Anthony, his mother, his Aunt, his brother and sister and her children. I understand that we are in a Covid crisis but this is a small gathering with people who have been seeing each other so the risk of Covid spread is small. I have reached out to the Government and his Pre-Trial Officer, Keyana Pompey and they do not support this request because it is office policy to deny all social requests and because of Covid. I respectfully ask the Court to allow the visit as this is a small family gathering that poses very little Covid risk because this group has acted as a pod throughout the pandemic. Mr. Melo assures me he will be on time and that the issues that plagued his last visit will not arise. As stated, his mother who was appointed by the Court as a Third Party Guardian will be with him the entire time.

Denied  
kmw

Thus, I would respectfully request that the Court grant the above request. Thank you for your consideration of this matter.

Most Respectfully,

David Touger

SO ORDERED: N.Y., N.Y. 5/14/21

Kimba M. Wood

KIMBA M. WOOD  
U.S.D.J.